

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Case No.: 6:18-bk-00479
Chapter 13

Marla McNear,
Debtor.

**RESPONSE TO CHAPTER 13 TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO
MAINTAIN TIMELY PLAN PAYMENTS**

Comes now the Debtor, by and through Counsel undersigned, and files this Response to Chapter 13 Trustee's Motion to Dismiss (Doc. No. 39), and in support thereof would state as follows:

1. The Trustee has a motion to dismiss for failure to maintain timely plan payments pending.
2. The Debtor made a TFS payment in the sum of \$556 in September and has made an additional payment of \$1000 for September 18th, a copy of payment is attached as exhibit A. (requested to allow 7 days to post)
3. The Debtor requests an extension of 14 days to post the remaining balance due required by the Motion to Dismiss.

WHEREFORE, the Debtor request this Court deny the motion to dismiss or set this matter for hearing and grant such other relief that may be just and proper in the circumstances.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been sent by either electronic transmission or U.S. Mail this 17th day of September 2019, to: Laurie K. Weatherford, Trustee, PO Box 3450, Winter Park, FL 32790; and to Debtor.

Sophia Dean, Esq.
THE ORLANDO LAW GROUP, PL
12301 Lake Underhill Rd. Suite 213
Orlando, Florida 32828
sdean@theorlandolawgroup.com
Attorney for Debtor

Subject: RE: McNear b/k Motion to Dismiss
Date: Tuesday, September 17, 2019 at 1:19:27 PM Eastern Daylight Time
From: McNear, Marla L.
To: Sophia Dean
Attachments: image014.jpg, image015.png, image016.png, image017.png, image018.jpg, image019.png, image020.png, image021.png, image022.jpg, image023.png, image024.png, image025.png, image026.png

Success!

Thank you for scheduling a manual payment through TFS. Your payment has been successfully scheduled.

Remember, your payment will be initiated on the date chosen, and arrive at your trustees office 5 business days later. You can check the status of your payments at any time by checking the upcoming and recent transactions on your TFS dashboard.

If you have any questions about this payment or your account, please [contact us](#).

[Return to dashboard](#)

Upcoming Transactions

Date	Payee	Type
September 18, 2019	Laurie K Weatherford	Manual Debtor Paymen

From: Sophia Dean <SDean@TheOrlandoLawGroup.com>
Sent: Tuesday, September 17, 2019 1:03 PM
To: McNear, Marla L. <marla.mcnear@ocps.net>
Subject: Re: McNear b/k Motion to Dismiss

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Sophia Dean

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Exhibit A